



cwn
Carlsbad Watershed Network

Member Organizations

Agua Hedionda Lagoon
Foundation

Batiquitos Lagoon Foundation

Buena Vista Lagoon
Foundation

Canyons Network

Cottonwood Creek
Conservancy

The Escondido Creek
Conservancy

Greater San Diego Resource
Conservation District

Preserve Calavera

San Elijo Lagoon
Conservancy

July 14, 2014

Laurie Walsh, P.E.

California Regional Water Quality Control Board, San Diego Region

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Cc:

Mikhail Ogawa <mikhail@mogawaeng.com>

Jamie Wood (james.wood@carlsbadca.gov)

Subject: Comments on Carlsbad WQIP Provision B.2a and B2b
submittal

Dear Ms. Walsh:

These are comments from Carlsbad Watershed Network on the
submittal. Due to time constraints, this is not as complete as we would
have liked.

The following reference the April 11, 2014 memorandum from Mikhail
Ogawa Engineering titled "Response to Comments Provided by
Consultation Panel Members Regarding January 22nd, 2014
Memorandum"

CWN comment 59- re comments that beneficial uses would be included
in info sent to RWQCB- it was passed on as a comment to RWQCB but
doesn't seem to have resulted in anything:

<p>59 Integration with Beneficial Uses</p>	<p>The LTEA conclusions include discussion of response to Question 1: Are conditions in receiving waters protective of beneficial uses? It then goes on to describe conditions for specific pollutants, but nowhere are those pollutants related back to beneficial uses. We think it is critical that the efforts expended on MS4 storm water permits also consider impacts on beneficial uses. It is the beneficial uses that will drive public support and ultimately funding available to address these pollutants. The selection of priority pollutants and the later selection of strategies both need to consider impact on beneficial uses.</p>	<p><i>Accepted</i></p> <p>Beneficial use information will be added for submittal to RWQCB.</p>
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CWN 60 /61/62 The concept of integrating land and water protection was mostly missed, and using structural BMP's above each lagoon as a last resort:

<p>60 Input from Carlsbad Watershed Management Plan</p>	<p>The Carlsbad Watershed Management Plan http://www.projectcleanwater.org/html/ws_carlsbad_plan_network_plan.html includes better integration with beneficial uses.</p> <p><i>“Goal 1: Protect, restore and expand the undeveloped open space that will provide self- sustaining hydrology and habitat connectivity.” (p. 1-4)</i></p> <p>Some of the top objectives there include: Protect and integrate blue belt, greenbelt and brown belt systems, Plan at the watershed level but analyze and implement at the sub-watershed level and Protect upland and headwaters open space</p> <p>Key recommended actions include: Develop and implement a stream buffer zoning policy, Develop exotic species management plans for each of the watersheds, Coordinate the augmentation of existing monitoring and data collection systems, Developing criteria for and implement last resort water quality structural BMP's just above each of the coastal lagoons and Develop watershed-wide public education program</p> <p>These goals and objectives remain important and should be integrated with selection criteria for both the highest priority pollutants and the selected strategies.</p>	<p><i>Partially accepted</i></p> <p>Where appropriate, these will be added to the potential strategies for consideration and the process for selection of final strategies.</p>
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<p>61 Input from Carlsbad Watershed Management Plan</p>	<p>Using the strategies of habitat restoration, stream buffer maintenance, and open space protection is vital to the solution of our water quality problems, has multiple benefits both for water conditions and otherwise, and should be given greater emphasis in the WQIP process.</p>	<p><i>Partially accepted</i></p> <p>Where appropriate, these will be added to the potential strategies for consideration.</p>
<p>62 Long vs Short Term Focus: Importance of Wetlands Preservation</p>	<p>We are concerned about coming up with the right balance between long and short term actions. If the focus is just on immediate reduction of an identified pollutant, the result may just be picking a few low hanging fruit from the tree and not taking on the more difficult, long term projects that will have much greater payback over time. For example, the list of Watershed Water Quality Activities includes "land acquisition." This strategy requires long term effort and often it will take years for any single acquisition to occur. But strategic acquisitions at headwaters and where buffers are inadequate can have significant long term benefits- and are putting resources into prevention rather than cures. In contrast, pet waste dog waste dispensers in county parks are low cost, short term fixes. But county park rangers report now that they have been installed they see plastic dog poop bags full of pet waste scattered all over, so the watershed is polluted with both pet waste and plastic. Somehow the evaluation system needs to be able to weigh these trade-offs.</p>	<p><i>Partially accepted</i></p> <p>The potential strategies will be evaluated by Responsible Agencies for inclusion into their jurisdictional programs and the Carlsbad WMA WQIP. It is anticipated that strategy selection will consider temporal application of strategies and their effectiveness at addressing HPWQC and PWQCs.</p>

CWN 63: Our concern was valuing natural processes- that concept seems to have been completely lost.

Many of the items on the "Potential Strategies" list are so cryptic they could mean anything making it harder to evaluate what they are.

We also object to the way all of our suggestions have been put into a list at the end that is identified as strategies from the public input. It seems like this is reinforcing the bias against the source of the suggestions.

We would recommend that agency and public strategies are put together in the appropriate category. An asterisk could be used to identify public input. Also, the public-sourced strategies should be organized the same way as the others are.

We have read the comment letter from Greg McBain, our Consultation Panel representative, and agree by and large with what he has stated there. In particular:

“3 .Page 10, first paragraph last sentence. We agree that if trash has not been identified during dry weather monitoring as a high priority issue, it should be monitored following wet weather conditions and at more locations. It tends to concentrate at certain areas, which clearly show trash is still a major issue in our watershed.

5. Page 13, Table 5. In our submitted comment letter of February 20, 2014, we attached a report entitled Bathymetric and Tidal Assessment of Batiquitos Lagoon, Carlsbad, California, Merkel & Associates, Inc., dated January 2009. Your response letter indicated that this new information was noted and would be incorporated into the WQIP as appropriate.”

....’Also, due to the relatively low imperviousness of the CHU watershed (18-percent impervious), BMPs targeted to impervious areas only may have limited impact on downstream water quality.’ If this statement were correct, it would indicate that “Undeveloped Land” should potentially be classified as a Pollutant Generating Source in Table 8.”

Thank you for your time and attention to this WQIP effort.

Brad Roth, Chairperson
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